

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

AL MALIK ALSHAHHI, et al.,

Defendants.

Case No.: 1:21-cr-00371-BMC-TAM

**DECLARATION OF JAMES A.
BOWMAN IN SUPPORT OF
DEFENDANT THOMAS J. BARRACK,
JR.'S MOTION TO COMPEL
DISCOVERY**

I, James A. Bowman, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney licensed to practice law in California and appearing in the above-entitled action *pro hac vice*. I am a partner with the law firm O'Melveny & Myers LLP, attorneys for defendant Thomas J. Barrack, Jr. in this matter. I respectfully submit this declaration in support of Mr. Barrack's motion to compel discovery.

2. Attached as Exhibit 1 is a true and correct copy of an August 17, 2021 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

3. Attached as Exhibit 2 is a true and correct copy of a July 27, 2021 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

4. Attached as Exhibit 3 is a true and correct copy of an October 26, 2021 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

5. Attached as Exhibit 4 is a true and correct copy of a December 22, 2021 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

6. Attached as Exhibit 5 is a true and correct copy of a January 14, 2022 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

7. Attached as Exhibit 6 is a true and correct copy of a January 7, 2022 letter from counsel for Mr. Barrack to Assistant United States Attorney Ryan Harris.

8. Attached as Exhibit 7 is a true and correct copy of a March 9, 2022 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

9. Attached as Exhibit 8 is a true and correct copy of a document produced by the government, Bates-stamped beginning BARRACK-000063979.

10. Attached as Exhibit 9 is a true and correct copy of a March 1, 2022 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

11. Attached as Exhibit 10 is a true and correct copy of a February 22, 2022 letter from counsel for Mr. Barrack to Assistant United States Attorney Ryan Harris.

12. Attached as Exhibit 11 is a true and correct copy of excerpts of handwritten notes from an unnamed FBI agent who attended the government's June 2019 interview of Mr. Barrack, which were produced by the government in discovery in this case.

13. Attached as Exhibit 12 is a true and correct copy of excerpts of the FBI-302 memorandum of Mr. Barrack's interview by the United States Attorney's Office for the Eastern District of New York and the Federal Bureau of Investigation on June 20, 2019.

14. Attached as Exhibit 13 is a true and correct copy of a document produced by the government, Bates-stamped beginning SCO-CLNS_0027886.

15. Attached as Exhibit 14 is a true and correct copy of a document produced by the government, Bates-stamped beginning SCO-CLNS_0008092.

16. Attached as Exhibit 15 is a true and correct copy of a document produced by the government, Bates-stamped beginning BARRACKGRIMES_0035842.

17. Attached as Exhibit 16 is a true and correct copy of certain text messages produced by government, Bates-stamped beginning BARRACK-000063779.

18. Attached as Exhibit 17 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of a February 14, 2018 interview with Stephen Bannon.

19. Attached as Exhibit 18 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of a January 22, 2018 interview with George Nader.

20. Attached as Exhibit 19 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of a June 5, 2018 interview with Rick Gerson.

21. Attached as Exhibit 20 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of an October 26, 2018 interview with Stephen Bannon.

22. Attached as Exhibit 21 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of an April 4, 2018 interview with Erik Prince.

23. Attached as Exhibit 22 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of an April 11, 2018 interview with Jared Kushner.

24. Attached as Exhibit 23 is a true and correct copy of an FD-302 report that was made available to the public through a FOIA request, with redactions, of a January 19, 2018 interview with George Nader.

25. Attached as Exhibit 24 is a true and correct copy of a document produced by the government, Bates-stamped beginning BARRACKGRIMES_0099069.

26. Attached as Exhibit 25 is a true and correct copy of a document produced by the government, Bates-stamped beginning BARRACKGRIMES_0097958.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 21, 2022
Santa Barbara, CA

O'MELVENY & MYERS LLP



James A. Bowman (admitted *pro hac vice*)
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
E-mail: jbowman@omm.com

Attorneys for Thomas J. Barrack, Jr.